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17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

19
20 **Edwardo Munoz**, individually and on
behalf of all others similarly situated,

21 Plaintiff,

22 v.

23 **7-Eleven, Inc.**, a Texas corporation,

24 Defendant.

Case No. 2:18-cv-03893-RGK-AGR

**JOINT STIPULATION FOR AN
EXTENSION OF ALL REMAINING
DEADLINES**

Judge: Hon. R. Gary Klausner

Complaint Filed: May 9, 2018
Trial Date: July 2, 2019

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27
28 **JOINT STIPULATION FOR AN EXTENSION
OF ALL REMAINING DEADLINES**

1 **TO THE HONORABLE COURT AND THE CLERK OF THE COURT:**

2 Pursuant to Local Civil Rule 7.1, Plaintiff Eduardo Munoz (“Plaintiff” or
3 “Munoz”) and Defendant 7-Eleven, Inc. (“Defendant” or “7-Eleven”) by and
4 through their respective counsel of record, hereby stipulate and request that the Court
5 enter an Order as follows:

6 WHEREAS, Plaintiff filed this action on May 9, 2018 (Dkt. 1);

7 WHEREAS, on October 22, 2018, this Court entered a Scheduling Order and
8 Order for Jury Trial, which set, among other deadlines, the following remaining
9 deadlines:

- 10 a. Discovery Cut-Off Date: April 3, 2019;
11 b. Motion Cut-Off Date: April 17, 2019;
12 c. Pretrial Conference: June 17, 2019; and
13 d. Jury Trial (Est. 3 days): July 2, 2019 at 9:00 a.m.

14 (Dkt. 44, 45.)

15 WHEREAS, to date, the Parties have been diligently litigating the case,
16 including fully briefing Defendant’s Motion to Dismiss, Plaintiff’s Motion for Class
17 Certification, and Plaintiff’s Proposed Class Notice Plan;

18 WHEREAS, the Parties have also been immersed in extensive discovery,
19 including: serving and responding to various written discovery requests, exchanging
20 informal discovery, serving a subpoena to produce documents upon Sterling
21 Infosystems, Inc., conducting the Rule 30(b)(6) deposition of Defendant’s
22 representative, and preparing for Plaintiff Munoz’s deposition scheduled for
23 February 20, 2019;

24 WHEREAS, the Parties have also reached an impasse regarding several
25 discovery requests and are in the process of resolving the dispute via the Magistrate
26 Judge’s discovery dispute procedures;

27 WHEREAS, in a good faith effort to resolve this matter, the Parties have
28 agreed to attend a full-day mediation session on April 9, 2019 in Toronto, Canada

**JOINT STIPULATION FOR AN EXTENSION
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1 with Mediator Michael E. Dickstein (this was the only date and location available for
2 Mr. Dickstein);

3 WHEREAS, despite efforts to meet the present deadlines, the Parties request a
4 brief 30-day extension of all remaining deadlines, including the discovery cut-off
5 date and the trial date;

6 WHEREAS, this stipulation is not entered into for the purpose of delay;

7 WHEREAS, the extension will enable the Parties to devote their time and
8 resources into resolving all remaining discovery matters and potentially resolving the
9 case altogether;

10 **THEREFORE**, in consideration of the foregoing, the Parties, by and through
11 their undersigned counsel, hereby stipulate, agree, and request that the Court enter an
12 Order as follows:

13 1. That all remaining deadlines be extended by 30-days, as follows:

14 a. Discovery Cut-Off Date: May 3, 2019;

15 b. Motion Cut-Off Date: May 17, 2019;

16 c. Pretrial Conference: July 17, 2019; and

17 d. Jury Trial (Est. 3 days): August 15, 2019 at 9:00 a.m.

18
19 **IT IS SO STIPULATED.**

20
21 Dated: February 18, 2019

Edwardo Munoz, individually and on behalf
of all others similarly situated,

22
23 By: /s/ Steven L. Woodrow
One of Plaintiff's Attorneys

24
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**JOINT STIPULATION FOR AN EXTENSION
OF ALL REMAINING DEADLINES**

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Attorneys for Plaintiff Edwardo Munoz

Dated: February 18, 2019

7-Eleven, Inc.,

By: /s/ Delavan J. Dickson
One of Defendant's Attorneys

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Attorneys for Defendant 7-Eleven, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above titled document was served upon counsel of record by filing such papers via the Court's ECF system on February 18, 2019.

/s/ Steven L. Woodrow